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AMERICAN EXPRESS NATIONAL BANK

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENNAFER AYCOCK,
Plaintiff,

vs.

AMERICAN EXPRESS NATIONAL
BANK; and EXPERIAN
INFORMATION SOLUTIONS, INC.,
Defendants.

Case No. 2:23-cv-00292-CDS-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR AMERICAN EXPRESS
TO RESPOND TO PLAINTIFF'S
MOTION TO COMPEL
DISCOVERY RESPONSES AND
SUPPLEMENTAL DISCLOSURES**

SECOND REQUEST

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1 Plaintiff Jennafer Aycock (“Plaintiff”) and defendant American Express
2 National Bank (“American Express”) (collectively, the “Parties”), through their
3 respective attorneys of record, hereby submit their Joint Stipulation to extend time to
4 respond to Plaintiff’s Motion to Compel Discovery Responses and Supplemental
5 Disclosures (ECF No. 52) (the “Motion”), and in support thereof state as follows:

6 1. On October 17, 2024, Plaintiff filed the Motion.

7 2. On October 31, 2024, American Express filed a Stipulation and Order
8 extending American Express’ deadline to respond to the Motion by eleven (11) days
9 and Plaintiff’s reply by seven (7) days. (ECF No. 53)

10 3. American Express’s deadline to respond to the Motion is currently
11 November 11, 2024.

12 4. Plaintiff’s reply in support of the Motion is currently due November 25,
13 2024.

14 5. The Parties have agreed to extend the time for American Express to
15 respond to the Motion by seven (7) days, up to and including November 18, 2024,
16 with a reciprocal extension of seven (7) days to the deadline for Plaintiff to file a
17 Reply Brief, up to and including December 2, 2024.

18 6. Good cause exists for granting this extension because the parties require
19 additional time to facilitate resolution of this matter and resolve certain discovery
20 disputes to conserve judicial resources.

21 7. This extension is sought in good faith and not for the purpose of delay.

22 8. No party will be prejudiced by the relief sought herein.

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1 THEREFORE, IT IS HEREBY STIPULATED that the time for American
2 Express to respond to the Motion be extended by seven (7) days, up to and including
3 November 18, 2024, with a reciprocal extension of seven (7) days to the deadline for
4 Plaintiff to file a Reply Brief, up to and including December 2, 2024.

5 Dated: November 8, 2024

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6 /s/ Alice Kwak

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16 Attorney for Defendant
17 American Express National Bank

18 **KAZEROUNI LAW GROUP, APC**

19 /s/ Gustavo Ponce

20 Gustavo Ponce
21 Mona Amini
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Jennafer Aycock

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: November 12, 2024

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